UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO. 22-CR-20085-ALTONAGA

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OSLANIR DELISLE, et al.,
Defendant.

GOVERNMENT'S SECOND RESPONSE TO THE STANDING DISCOVERY ORDER

The United States hereby files this second response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16, and is numbered to correspond with Local Rule 88.10.

- A.
- 5. The attachments to this discovery response consist of forensic examination of electronics taken at the time of arrest of the defendants.
- B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

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The attachments to this response are contained on a flash drives (Delisle and Gonzalez) and included on the hard drive with initial discovery for counsel for Lovett. Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted, JUAN ANTONIO GONZALEZ UNITED STATES ATTORNEY

By: /s/Monique Botero

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered by

United States mail this 2nd day of May, 2022, to:

Counsel for Delilse Roy J. Kahn 420 S. Dixie Highway, Suite 4b Coral Gables, FL 33146

Counsel for Lovett Samuel Rabin, Esq. SunTrust International Center One SE Third Ave., Suite 2600 Miami, FL 33131-1715

Counsel for Duran Gonzalez Israel Encinosa, Esq. 9100 S. Dadeland Blvd., Suite 1500 Miami, FL 33156

> /s/Monique Botero MONIQUE BOTERO Assistant United States Attorney